

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

KT IMAGING USA, LLC,

Plaintiff,

Case No.: 6:21-cv-01002-ADA

v.

APPLE INC.,

Defendant.

Jury Trial Demanded

JOINT MOTION TO DISMISS

WHEREAS, Plaintiff KT Imaging USA, LLC (“Plaintiff”) and Defendant Apple Inc. (“Apple”) have resolved Plaintiff’s claims for relief against Apple and Apple’s counterclaims for relief against Plaintiff asserted in this case.

NOW, THEREFORE, Plaintiff and Apple, through their attorneys of record, request this Court to dismiss Plaintiff’s claims for relief against Apple with prejudice and Apple’s claims, defenses or counterclaims for relief against Plaintiff without prejudice, and with all attorneys’ fees, costs of court and expenses born by the party incurring same.

Dated: April 29, 2022

Respectfully submitted,

Respectfully submitted,

By: /s/ Dmitry Kheyfits

By: /s/ Ryan Schletzbaum

Dmitry Kheyfits
State Bar No. 24115271
dkheyfits@kblit.com
Brandon G. Moore
State Bar No. 24082372
bmoore@kblit.com
Kheyfits Belenky LLP
108 Wild Basin Road, Suite 250

J. Stephen Ravel
Texas State Bar No. 16584975
KELLY HART & HALLMAN LLP
303 Colorado, Suite 2000
Austin, Texas 78701
Tel: (512) 495-6429
steve.ravel@kellyhart.com

Austin, TX 78746
Tel: 737-228-1838
Fax: 737-228-1843

Andrey Belenky
State Bar No. 4524898
abelenky@kblit.com
Hanna G. Cohen
State Bar No. 4471421
hgcohen@kblit.com
Kheyfits Belenky LLP
80 Broad Street, 5th Floor
New York, NY 10004
Tel: 212-203-5399
Fax: 212-203-5399

Stafford Davis
State Bar No. 24054605
sdavis@stafforddavisfirm.com
Catherine Bartles
State Bar No. 24104849
cbartles@stafforddavisfirm.com
The Stafford Davis Firm, PC
815 South Broadway
Tyler, Texas 75701
Tel: (903) 593-7000
Fax: (903) 705-7369

*Attorneys for Plaintiff
KT Imaging USA, LLC*

Mark D. Schafer (*pro hac vice*)
Ryan Schletzbaum (*pro hac vice*)
Lauren Douville (*pro hac vice*)
Shook Hardy & Bacon, LLP
2555 Grand Boulevard
Kansas City, MO 64108
Tel: (816) 474-6550
Fax: (816) 421-5547
mschafer@shb.com
rschletzbaum@shb.com
ldouville@shb.com

Attorneys for Defendant Apple Inc.